REMARKS

Allowable Subject Matter

Applicants thank the examiner for indicating that claims 5, 12 and 20 define patentable subject matter and would be allowable is rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claim Rejections - 35 U.S.C. § 112

In the office action, claims 1-22 have been rejected under 35 U.S.C. § 112 as allegedly being indefinite. In view of the present amendments to claims 1, 8 and 16, applicants respectfully request that this rejection be withdrawn.

The examiner indicates that "the body of the claims does not perform what is set forth in the preamble." As noted in the amendment of March 5, 2004, applicants respectfully disagree. However, in order to advance the prosecution of these claims, and without intentionally surrendering subject matter or equivalents thereof, claims 1, 8, and 16 have been amended to more particularly point out that a summary is generated as a result of the performance of the claimed method steps. Accordingly, applicants respectfully request withdrawal of the rejection to Claims 1-22 under 35 U.S.C. § 112, ¶ 2.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4, 6-11, 13-19 and 21-22 have been rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,098,034 to Razin et al ("the '034 patent"). This rejection has been made final. Applicants respectfully traverse and request reconsideration and allowance of these claims.

As noted in Applicant's response of March 5, 2004, the present claims are directed to systems and methods for generating a summary of *a plurality of* related documents. As set forth in claim 1, the claimed method steps include, *inter alia*, "extracting phrases...from the plurality of documents" and "performing sentence generation" using the extracted phrases which have been acted on by other method steps. Because phrases are extracted from multiple documents, which may be generated at different times, a temporal processing step is performed, such as to sequencing the phrases or eliminating ambiguous temporal references prior to generating a summary.

In the office action, it is stated that "when read in light of the specification, the invention as claimed does not support applicants assertion" which were argued in the March 5, 2004, amendment. Applicants respectfully disagree. As noted above, the preamble and body of claim 1 expressly refer to "a plurality of related documents." It is well established that "a plurality" means more than one. In addition, the application as a whole is clearly directed to generating a summary for a collection with more than one of document. For example: the title of the application is "Multidocument Summarization System and Method;" the Abstract states that a "...summary for a collection of related documents can be generated..." (the Abstract also discusses temporal processing and

sentence generation to generate the summary); and Figure 1 is identified as "a flow chart illustrating the operation of the present *multiple* document summarization system." Thus, applicants arguments are clearly commensurate with the scope of the plain meaning of the claim language and the claims when viewed in light of the specification.

The '034 patent, which is entitled "Method for Standardizing Phrasing in a Document," is not directed to multiple document summarization, does not disclose extracting phrases from multiple documents and does not disclose temporal processing of extracted phrases. Indeed, the '034 patent fails to teaches any operations on "a plurality of documents" or any method for generating a summary for a plurality of documents (or even a summary of a single document). Therefore, a prima facie showing of obviousness of the pending claims in view of the '034 patent cannot be maintained.

The '034 patent is directed a method for standardizing phrasing within a single document. This is a different problem than that addressed by the current application and therefore has a different solution. The '034 patent discloses analyzing a single user created document to identify standard phrases and then identifies phrases that are similar to, but not identical to the standard phrases and then discloses replacing the similar phrases with the standard phrases in that same document. The examiner points to Col. 2 lines 43-60 and col. 3, lines 20-63 of Razin for the teaching of "extracting phrases...from the plurality of documents." However, in the cited passage in Column 2, Razin first refers to: "standardizing user phrasing *in a user-created document.*" [Col. 2, line 43] and then continues to refer back to "*the document*" three times, clearly referring to processing on one, and only one document. [See col. 2, lines 46, 49, 63]. Similar language is found

in the cited passage of column 3. There is simply no teaching in Razin to operate on "a plurality of related documents" as described and claimed in the present application.

It is not surprising that Razin only refers to processing of a single document, since the purpose of this reference is to identify similar phrases within a document and replace similar phrases with a standard phrase with the goal of improving consistency and precision of language within a single document. (See e.g., Razin col. 1, lines 5-19). While there may be benefits to standard phrasing within a particular document in order to improve precision, this same benefit does not apply across multiple documents where an author may intentionally use similar, yet slightly different, phrasing to mean different things in different documents. Indeed, a "standard phrase" identified in one user created document may be wholly inappropriate as a replacement for a similar phrase in a different document written by a user. Thus, Razin et al. do not teach or suggest extracting phrases from "a plurality of related documents" as set forth in the pending claims.

Further, Razin et al. do not disclose the claimed step of temporal processing. The office action cites col. 2 lines 43-60 for allegedly supporting the proposition that Razin teaches "temporal processing." Applicants disagree. Applicants find no teaching of temporal processing in the cited passage of Razin or anywhere else in this reference. Inasmuch as Razin et al. are dealing with only a single document, there is simply no motivation for Razin et al. to perform the claimed step of temporal processing.

In view of the absence of any disclosure regarding the noted claim elements or the invention as a whole, applicants respectfully submit that independent claims 1, 8, 16 each

define patentable subject matter over the art of record. Claims 2-4, 6, 9-11, 13-15 17-19 and 21-22 depend from these claims are patentable at least for the reasons set forth above.

It is respectfully submitted that the amendments to the claims are insubstantial and do not necessitate new grounds for rejection or a new search. Since the present amendment is believed to attend to the §112 rejections raised by in the office action, it is respectfully submitted that such this amendment places all claims in condition for allowance or, at least, in better condition for appeal. Accordingly, in view of the present amendments and remarks, entry of the present amendment and favorable reconsideration and allowance of claims 1-22 are respectfully solicited.

Respectfully submitted,

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